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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

V.

MARK DANNELES, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE,  
SEAN SANBORN, ERIC  
SCHWENNINGER, RICHARD WALTER,  
CHRIS WEBLEY, ANTHONY WETMORE,  
KATHY WILCOX, CRAIG ZANNI, DAVID  
ZAVALA, JOEL D. SHAPIRO AS  
ADMINISTRATOR OF THE ESTATE OF  
DAVID E. HALL, VIDOCQ SOCIETY,  
CITY OF COQUILLE, CITY OF COOS  
BAY, and COOS COUNTY,

Defendants.

Civil Case No. 6:20-CV-01163-MTK  
(Lead Case)

DEFENDANT VIDOCQ SOCIETY'S  
MOTION FOR EXTENSION OF TIME  
TO FILE REPLY BRIEF

VIDOCQ SOCIETY,

Cross-Claimant.

v.

MARK DANNELS, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE,  
SEAN SANBORN, ERIC  
SCHWENNINGER, RICHARD WALTER,  
CHRIS WEBLEY, ANTHONY WETMORE,  
KATHY WILCOX, CRAIG ZANNI, DAVID  
ZAVALA, JOEL D. SHAPIRO AS  
ADMINISTRATOR OF THE ESTATE OF  
DAVID E. HALL, CITY OF COQUILLE,  
CITY OF COOS BAY, and COOS COUNTY.

Cross Defendants

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Plaintiffs,

v.

OREGON STATE POLICE,

Defendant.

Civil Case No. 3:21-cv-01719-MTK  
(Trailing Case)

### **CERTIFICATE OF CONFERRAL**

Pursuant to LR 7-1, undersigned counsel has conferred in good faith with the respective parties' counsel in this action before filing this motion. All counsel have advised that they do not object to the relief requested by Vidocq Society.

### **MOTION FOR EXTENSION OF TIME**

Defendant Vidocq Society respectfully moves for an order extending the deadline for Vidocq Society to file its Reply brief in support of its Motion for Summary Judgment. Vidocq

requests a one week extension of time to file its Reply brief, with the new deadline being set for March 18, 2025.

As explained in the concurrently filed Declaration of Meredith A. Sawyer, Vidocq Society's request is based upon counsel's personal circumstances in which counsel is experiencing a serious medical issue that was only recently diagnosed and which requires immediate treatment. This medical issue is continuing in nature through the present time and has impacted counsel's ability to attend to and focus on the completion of the Reply brief in support of Defendant Vidocq Society's Motion for Summary Judgment. *See*, Declaration of Meredith A. Sawyer.

RESPECTFULLY SUBMITTED, this 7<sup>th</sup> day of March, 2025.

HWS LAW GROUP

BY: /s/ Meredith A. Sawyer  
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*Attorneys for Defendant Vidocq Society*

CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Oregon, that the following is true and correct:

I am employed by the law firm of HWS Law Group.

At all times hereinafter mentioned, I was and am a citizen of the United States of America, a resident of the State of Washington, over the age of eighteen (18) years, not a party to the above-entitled action, and competent to be a witness herein.

On the date set forth below I served the document(s) to which this is attached, in the manner noted on the following person(s):

PARTY/COUNSEL	DELIVERY INSTRUCTIONS
<b><u>CO / Plaintiffs</u></b> Janis C. Puracal Andrew C. Lauersdorf Maloney Lauersdorf Reiner PC 1111 E. Burnside Street, Suite 300 Portland, OR 97214	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable jcp@mlrlegalteam.com acl@mlrlegalteam.com cv@mlrlegalteam.com ms@mlrlegalteam.com
<b><u>CO / Plaintiffs</u></b> David B. Owens, <i>Pro Hac Vice</i> Loevy & Loevy 100 S. King Street, Suite 100 Seattle, WA 98104-2885	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable david@loevy.com
<b><u>CO / Defendants City of Coquille, City of Coos Bay, Coos County, Craig Zanni, Chris Webley, Eric Schwenninger, Sean Sanborn, Ray McNeely, Kris Karcher, Pat Downing, Mark Dannels, Kip Oswald, Michael Reaves, David Zavala, Anthony Wetmore and Shelly McInnes</u></b> Robert E. Franz, Jr. Sarah R. Henderson Law Office of Robert E. Franz, Jr. PO Box 62 Springfield, OR 97477	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable rfranz@franzlaw.comcastbiz.net shenderson@franzlaw.comcastbiz.net
<b><u>CO / Defendants John Riddle, Susan Hormann, Mary Krings, Kathy Wilcox, and Oregon State Police</u></b> Jesse B. Davis Todd Marshall Kristen Hoffmeyer Oregon Department of Justice 100 SW Market Street Portland, OR 97201	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable jesse.b.davis@doj.oregon.gov todd.marshall@doj.oregon.gov kristen.hoffmeyer@doj.oregon.gov maureen.a.mccarthy@doj.oregon.gov jennifer.burdick@doj.oregon.gov

<b><u>CO / Defendant Richard Walter</u></b> Eric S. DeFreest Luvaas Cobb 777 High Street, Suite 300 Eugene, OR 97401	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable edefreest@luvaascobb.com KWorkman@luvaascobb.com
<b><u>CO / Defendant Richard Walter</u></b> Laura E. Coffin Coffin Law 541 Willamette St Ste 211 Eugene OR 97401 541-325-8080	<input type="checkbox"/> Via U.S. Mail <input checked="" type="checkbox"/> Via E-Mail <input type="checkbox"/> Via Overnight Mail <input checked="" type="checkbox"/> Via Court E-Service, if applicable lauracoffin@coffin.law

DATED this 7<sup>th</sup> day of March, 2025.

/s/ Caroline Bryant  
Caroline Bryant, Legal Assistant